

UNITED STATES DISTRICT COURT
for the
District of New Jersey

United States of America)
v.)
Steincy Mathieu) Case No.
) 20-1037 (AMD)
)
)
)
)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of Oct. 2016 through May 13, 2020 in the county of Essex and Burlington in the
District of New Jersey, the defendant(s) violated:

Code Section

Offense Description

18 USC 1349, 18 USC 1341, 18 USC 1343

Conspiracy to Commit Wire and Mail Fraud
(See Attachment A)

This criminal complaint is based on these facts:

See Attachment B

Continued on the attached sheet.

Mark

Complainant's signature

Special Agent Melissa Gibson, USAO

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone

Date: 06/18/2020

Judge's signature

City and state: District of New Jersey

Hon. Ann Marie Donio, U.S.M.J.

Printed name and title

ATTACHMENT A**CONSPIRACY TO COMMIT WIRE AND MAIL FRAUD**
(18 U.S.C. § 1349)

From at least as early as October 2016 through on or about May 13, 2020, in Essex County and Burlington County, in the District of New Jersey, and elsewhere, the defendants

MARTINS INALEGWU and STEINCY MATHIEU

did knowingly and intentionally conspire and agree with each other, uncharged co-conspirators, including Co-Conspirator 1, and others in the devise of scheme and artifice to defraud Victims 1 through 33, and others, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing such scheme and artifice: (1) to cause to be transmitted by means of wire communications in interstate and foreign commerce, certain signs, signals, pictures and sounds, contrary to Title 18, United States Code, Section 1343; including but not limited to, the wire transactions set forth below and as further described in Attachment B:

VICTIM	DATE RANGE OF WIRES	AMOUNT OF WIRE	RECIPIENT BANK	RECIPIENT ACCOUNT NUMBER LAST 4 DIGITS	RECIPIENT NAME
Victim 1	10/12/16	\$8,000	Bank of America	-5657	INALEGWU
Victim 1	4/13/17	\$9,500	Bank of America	-7510	MATHIEU
Victim 1	4/14/17	\$9,500	Bank of America	-7510	MATHIEU
Victim 1	5/2/17	\$7,000	Bank of America	-7510	MATHIEU

VICTIM	DATE RANGE OF WIRES	AMOUNT OF WIRE	RECIPIENT BANK	RECIPIENT ACCOUNT NUMBER LAST 4 DIGITS	RECIPIENT NAME
Victim 7	6/14/19	\$10,098	M&T Bank	-2493	INALEGWU
Victim 10	11/10/17	\$13,340.60	Bank of America	-7510	MATHIEU
Victim 10	11/15/17	\$40,000	Bank of America	-7510	MATHIEU
Victim 13	10/12/18	\$12,000	TD Bank	-8157	MATHIEU
Victim 13	11/19/18	\$10,000	Bank of America	-0593	INALEGWU
Victim 16	6/4/19	\$8,850	JPM Chase	-3895	INALEGWU
Victim 16	6/27/19	\$47,000	JPM Chase	-3895	INALEGWU
Victim 18	11/27/19	\$19,500	JPM Chase	-2551	INALSBECH
Victim 18	1/8/20	\$22,500	JPM Chase	-2551	INALSBECH
Victim 20	12/20/19	\$15,700	JPM Chase	-2551	INALSBECH
Victim 20	12/20/19	\$8,000	JPM Chase	-2551	INALSBECH
Victim 29	5/5/20	\$10,000	Republic First	-1230	INALSBECH
Victim 29	5/13/20	5,000	Republic First	-0951	INALEGWU

and (2) to cause to be placed or caused to be deposited in a post office and authorized depository for mail to be delivered by the United States Postal Service and any private or commercial carrier certain mail matters, contrary to Title 18, United States Code, Section 1341; including but not limited to, the mailings set forth below and as further described in Attachment B:

VICTIM	DATE OF MAILING	CHECK AMOUNT	PAYEE NAME	BANK OF FIRST DEPOSIT	BANK ACCOUNT NUMBER LAST 4 DIGITS
Victim 2	5/22/17	\$30,000	MATHIEU	Bank of America	-7510
Victim 2	6/12/17	\$70,000	MATHIEU	Bank of America	-7510
Victim 2	6/30/17	\$60,000	MATHIEU	Bank of America	-7510
Victim 2	7/31/17	\$30,000	MATHIEU	Bank of America	-7510
Victim 2	7/31/17	\$100,000	MATHIEU	Bank of America	-7510
Victim 2	9/6/17	\$70,000	MATHIEU	Bank of America	-7510
Victim 2	10/2/17	\$75,000	MATHIEU	Bank of America	-7510
Victim 2	10/2/17	\$85,000	MATHIEU	Bank of America	-7510
Victim 2	10/10/17	\$90,000	MATHIEU	Bank of America	-7510
Victim 2	10/23/17	\$20,000	MATHIEU	Bank of America	-7510
Victim 2	11/29/17	\$80,000	MATHIEU	TD Bank	-8157
Victim 2	12/20/17	\$70,000	MATHIEU	TD Bank	-8157
Victim 2	1/29/18	\$72,000	MATHIEU	TD Bank	-8157
Victim 2	2/12/18	\$30,000	MATHIEU	TD Bank	-8157
Victim 2	3/6/18	\$40,000	MATHIEU	TD Bank	-8157
Victim 2	3/19/18	\$61,000	MATHIEU	TD Bank	-8157
Victim 2	3/21/18	\$59,000	MATHIEU	TD Bank	-8157

VICTIM	DATE OF MAILING	CHECK AMOUNT	PAYEE NAME	BANK OF FIRST DEPOSIT	BANK ACCOUNT NUMBER LAST 4 DIGITS
Victim 2	4/10/18	\$90,300	MATHIEU	TD Bank	-8157
Victim 2	4/20/18	\$82,200	MATHIEU	TD Bank	-8157
Victim 2	5/11/18	\$84,250	MATHIEU	Wells Fargo	-6673
Victim 2	5/14/18	\$88,250	MATHIEU	HSBC	-0381
Victim 2	6/5/18	\$87,200	MATHIEU	TD Bank	-8157
Victim 2	7/2/18	\$88,150	MATHIEU	TD Bank	-8157
Victim 2	7/26/18	\$88,000	MATHIEU	TD Bank	-8157
Victim 2	7/30/18	\$87,000	MATHIEU	TD Bank	-8157
Victim 2	8/8/18	\$85,500	MATHIEU	TD Bank	-8157
Victim 2	8/8/18	\$89,500	MATHIEU	TD Bank	-8157
Victim 2	9/13/18	\$86,500	MATHIEU	TD Bank	-8157
Victim 2	9/14/18	\$88,500	MATHIEU	TD Bank	-8157
Victim 15	8/16/19	\$10,000	INALSBECH	BB&T	-0008
Victim 15	10/8/19	\$11,000	INALSBECH	JPM Chase	-2551
Victim 24	12/20/19	\$27,000	INALSBECH	JPM Chase	-2551
Victim 24	12/27/19	\$10,000	INALSBECH	JPM Chase	-2551
Victim 24	1/6/20	\$10,000	INALSBECH	JPM Chase	-2551

Contrary to Title 18, United States Code, Sections 1341 and 1343, in violation of Title 18, United States Code, Section 1349.

ATTACHMENT B

I, Melissa Gibson, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the United States Attorney's Office, and have been so employed since November 2016. I am currently assigned to the District of New Jersey, Trenton and Camden, New Jersey offices. I have been employed as a Special Agent with the federal government for approximately 24 years. Prior to becoming a Special Agent with the United States Attorney's Office, I was employed as a Special Agent with the Defense Criminal Investigative Service, the United States Secret Service, the Department of Health and Human Service - Office of Inspector General, and the United States Postal Service - Office of Inspector General. During my 24-year career in federal law enforcement, I have participated in, and conducted, many criminal investigations involving violations of the laws of the United States, including but not limited to laws relating to false, fictitious, and fraudulent claims, wire fraud, mail fraud, money laundering, and computer-related offenses. I have completed specialized training through the Federal Law Enforcement Training Center, including the Criminal Investigator Training Program. Through this training and experience, I have become familiar with a wide variety of fraudulent schemes and the federal statutes proscribing such fraudulent activity. I have participated in the execution of many search warrants, including those involving the search and seizure of electronic evidence. I have not included every detail or every aspect of my training, education, and experience but have highlighted those areas most relevant to this application.

2. The information contained in this Affidavit is based upon my personal knowledge and observation, my training and experience, conversations with other law enforcement officers (including officers who have engaged in numerous investigations involving fraud, money laundering, and computer-based crimes), victim interviews, and the review of documents and records. Because this Affidavit is being submitted for the limited purpose of establishing probable cause to issue a complaint, I have not included every detail of every aspect of the investigation. Rather, I have set forth only those facts that I believe are necessary to establish probable cause to support the charge in the complaint. Unless specifically indicated, all conversations and statements described in this Affidavit are related in substance and in part.

SUMMARY OF FRAUDULENT SCHEME

3. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that Martins Friday INALEGWU (hereinafter "INALEGWU") and Steincy MATHIEU (hereinafter "MATHIEU") knowingly conspired with individuals and entities, including uncharged CO-CONSPIRATOR 1 (hereafter "CC1"), and others, in the United States, Nigeria and Turkey (hereinafter, all targets in the United States and abroad are collectively referred to as "the targets"), to defraud unsuspecting victims in the United States and abroad. The victims in this investigation reported being the victim of either a romance scam or an apartment rental scam and

all of the victims sent money to either MATHIEU, INALEGWU or both.

4. Romance scams are a type of confidence scam involving feigning romantic intentions towards a victim using fictitious identities, gaining their affection, and then using that goodwill to commit fraud. The targets made initial contact with victims through on-line dating and social media websites, then corresponded with victims via email and phone, pretended to strike up a romantic relationship with victims, wooed them with words of love, and then requested the victims send money to them, or their associates, for fictitious emergency needs (i.e. customs fees and taxes, medical expenses, travel expenses, business expenses, etc.). In all instances, the individuals whom the victims believed they were speaking to did not exist, and instead they were speaking to the targets or co-conspirators of the targets. The scam email accounts used to communicate with victims in this case were operated by targets and not the fictitious persons that the victims believed them to be. Targets often used multiple scam email accounts to communicate with a single victim.

5. Apartment rental scams are fraudulent scams involving the rental of a property, not owned or controlled by the target, for the purpose of collecting money from the victim in the form of application fees and security deposits. The targets listed advertisements on-line, enticed victims with information about the properties, pretended they were authorized to rent the properties, and then directed that the victims complete applications and send money to either the targets or co-conspirators, in the form of down payments to reserve the properties. The targets communicated with the victims of this scam exclusively by email, and the scam email accounts used to communicate with victims were operated by targets or co-conspirators of the targets.

6. From at least as early as October 2016 to present, this investigation has identified approximately 33 victims, with a collective loss amount of approximately \$6 million¹. All verified victims were directed to send, and actually sent, money to either MATHIEU, INALEGWU or both, either by cash deposit, wire transfer, check, or MoneyGram. In total, these 33 victims sent approximately \$3.1 million to MATHIEU and INALEGWU.²

7. The New Jersey targets controlled bank accounts at nine different banks in New Jersey which they used to deposit victim money and facilitate the scheme.

8. INALEGWU also owns and operates a business named Inalsbech LLC (hereafter “Inalsbech”) which he used to facilitate the fraudulent scheme. Per records from the state of New Jersey, on June 3, 2019, MATHIEU registered Inalsbech as a limited liability company in New Jersey. On formation documents, Inalsbech’s business address was listed as INALEGWU’s residence in Maple Shade, New Jersey (hereinafter, “the Maple Shade address”) and the business purpose was listed as “WE

¹ Based on a review of bank records, additional victims with an additional \$1.2 million in payments to subjects have been identified but not yet interviewed and confirmed.

² The other \$2.9 million identified either went directly to foreign targets or to other as yet unidentified co-conspirators.

ARE INTO BUYING AND SELLING HOUSES AND LANDED PROPERTY, OR IMPROVEMENTS OF BUILDING AND FENCING WELLS ETC AIRBNB VACATION HOMES INCLUDED.” INALEGWU opened business bank accounts for Inalsbech at five different banks in New Jersey, and used those bank accounts to deposit and launder victim proceeds.

9. Victims were instructed by email and phone to wire money to bank accounts held, or controlled by, INALEGWU, MATHIEU, and others. Victims were also instructed to mail personal, business, and cashier’s checks to INALEGWU and MATHIEU at their residential addresses in New Jersey, as well as to the addresses of other co-conspirators.

10. Victims were also instructed to wire money to bank accounts held by Inalsbech, INALEGWU’s business. Victims were instructed to mail cashier’s checks payable to Inalsbech to the Maple Shade address. For example, in April of 2020, VICTIM 26 was instructed to send two cashier’s checks, valued at \$11,000 and \$80,000 and made payable to Inalsbech, to the Maple Shade address. Both checks were endorsed by INALEGWU and deposited into Republic Bank account x1230, held by Inalsbech.

11. Per a review of bank records, INALEGWU, MATHIEU and others, endorsed and deposited the checks they received from the victims, which were sent by mail. Many of these checks, both personal and cashier’s checks, were valued in the thousands of dollars.

12. A review of financial records revealed the fraudulently obtained funds were not used for the purposes claimed by the targets. Among the many alleged needs for the funds were: to pay customs fees and taxes, fund diamond mining operations, pay medical expenses, or secure apartments. Instead, after receipt of victim monies into their bank accounts, MATHIEU and INALEGWU spent the victims’ money on personal expenses (i.e. rent, food, phone bills, travel, etc.), withdrew money in cash, transferred money to other bank accounts they personally controlled, and transferred money to bank accounts held by co-conspirators, including CC1, in Nigeria and Turkey.

THE TARGETS

MATHIEU and INALEGWU

13. INALEGWU is a native and citizen of Nigeria. On January 10, 2015, INALEGWU traveled to the United States on a B2 Visitor visa. On March 29, 2016, INALEGWU married MATHIEU, a United States citizen. In June 2018, INALEGWU was granted lawful permanent resident status in the United States. INALEGWU and MATHIEU have two young children. INALEGWU currently resides at the Maple Shade address.³ INALEGWU also operates Inalsbech, LLC, described above and below, from the Maple Shade address. MATHIEU and INALEGWU previously resided in Irvington, New Jersey and previously received funds at that address from multiple victims.

14. Per the review of bank records and victim interviews, from October 2016

³ The current residential address for MATHIEU is unknown.

to the present, INALEGWU and MATHIEU personally received approximately \$3.1 million dollars from 33 victims.

INALSBECH, LLC

15. Inalsbech is a purported property management company owned and operated by INALEGWU from the Maple Shade address. From 2018 to 2020, INALEGWU opened at least five business checking accounts, at five different banks, in the Inalsbech company name. The review of bank records reveals that INALEGWU solely controlled the bank accounts, all five bank accounts received victim monies, and three of those accounts were used to wire transfer victim proceeds to co-conspirators in Nigeria.

16. On June 28, 2018, INALEGWU opened a business checking account at TD Bank ending in 2617 (hereinafter “TD account x2617”). The account was held in the name “Inalsbech,” with INALEGWU as the sole signature on the account. On the account application, INALEGWU provided his prior residence as the business address. On account opening documents, INALEGWU stated he was the owner and CEO of Inalsbech, a business that buys, sells, and rents out homes. When opening the account, INALEGWU provided the bank with copies of formation documents indicating that INALEGWU formed Inalsbech in the state of New Jersey on or about May 8, 2018. On the formation documents, the business purpose was listed as “Sell, develop, and manage property for others and also vacation homes,” and the business location was listed as INALEGWU and MATHIEU’s prior residence in New Jersey. INALEGWU also provided TD Bank with a copy of a letter from the Internal Revenue Service dated June 25, 2018, addressed to “INALSBECH, MARTINS INALEGWU GEN PTR”, stating that Inalsbech was assigned Employer Identification Number 83-1004466. On numerous occasions, INALEGWU transferred money he received from victims in other accounts to this business account, TD account x2617. For example, on September 18, 2018, two checks from VICTIM 2, with a combined value of \$175,000 were deposited to a joint personal account held by INALEGWU and MATHIEU at TD Bank ending in 8157 (hereafter “TD account x8157”). Several days later, on September 24, 2018, INALEGWU transferred \$10,500 of victim proceeds from TD account x8157 to the Inalsbech account (TD account x2167). INALEGWU also used the Inalsbech account (TD account x2167) to wire transferred money to co-conspirators in Nigeria. For example, on September 18, 2018, INALEGWU wire transferred \$14,200 to a bank account in Nigeria held by MOROCHI NIGERIA LIMITED. TD account x2167 was closed on November 2, 2018.

17. On November 26, 2018, INALEGWU opened a business checking account at Santander Bank ending in 0294 (hereinafter “Santander account x0294”). The account was held in the name “Martins Inalegwu Gen Ptr,” with INALEGWU as the sole signature on the account. On the account application, INALEGWU listed the business as a sole proprietorship with the stated business purpose of “lessors of other real estate property.” INALEGWU provided his prior residence as the business address. On account opening documents, INALEGWU stated he was the owner and manager of the business. INALEGWU also provided a copy of the letter from the Internal Revenue Service dated June 25, 2018 and addressed to “INALSBECH, MARTINS INALEGWU

GEN PTR", stating the business was assigned Employer Identification Number 83-1004466. Santander account x0294 was used to receive victim proceeds. For example, on March 11, 2019, INALEGWU endorsed and deposited a check in the amount of \$199,601 from VICTIM 14⁴ into the account. Santander account x0294 was closed on April 23, 2019.

18. Per records from the state of New Jersey, on June 3, 2019, MATHIEU registered Inalsbech as a limited liability company in New Jersey. On formation documents, Inalsbech's business address was listed as the Maple Shade address and the business purpose was listed as "WE ARE INTO BUYING AND SELLING HOUSES AND LANDED PROPERTY, OR IMPROVEMENTS OF BUILDING AND FENCING WELLS ETC AIRBNB VACATION HOMES INCLUDED."

19. On June 4, 2019, INALEGWU opened a checking account for Inalsbech at Branch Banking and Trust ending in 0008 (hereafter "BB&T account x0008"). INALEGWU was the only authorized signor on the account. On account opening documents, INALEGWU provided the business address as the the Maple Shade address. The bank account was used to receive victim money. For example, on August 28, 2019, INALEGWU endorsed and deposited a \$10,000 personal check from VICTIM 15⁵ into the account. INALEGWU also wire transferred money to co-conspirators in Nigeria from this account. For example, on July 3, 2019, INALEGWU wired \$40,500 from the account to MOROCHI NIGERIA LIMITED in Nigeria. BB&T account x0008 was closed on September 11, 2019.

20. On August 28, 2019, INALEGWU opened a checking account for Inalsbech at JP Morgan Chase ending in 2551 (hereinafter "Chase account x2551"). INALEGWU was the only authorized signor on the account. On account opening documents, INALEGWU provided the business address as the Maple Shade address. This bank account was used to receive victim money. For example, on October 9, 2019, INALEGWU endorsed and deposited an \$11,000 personal check from VICTIM 15 into the account. INALEGWU also wire transferred money to co-conspirators in Nigeria from this account. From October 2019 to January 2020, INALEGWU initiated approximately 26 large dollar wire transfers from this account, totaling approximately \$399,569, to MOROCHI NIGERIA LIMITED in Nigeria. Chase account x2551 was closed on January 23, 2020.

21. On January 17, 2020, INALEGWU opened a business checking account for Inalsbech at Citizens Bank ending in 7884 (hereafter "Citizens Bank x7884"). INALEGWU was the only authorized signor on the account. On account opening documents, INALEGWU provided the business address as the Maple Shade address. This bank account was used to receive victim money. For example, on February 4,

⁴ When interviewed, VICTIM 14 stated he was not the victim of a romance or apartment scam. VICTIM 14 further stated that he did not write the check to Inalsbech, that he did not authorize anyone else to write the check, and that he did not know how his account was compromised. The check was subsequently reversed.

⁵ Victim 15 was the victim of a romance scam.

2020, VICTIM 33⁶ sent a wire transfer to Citizens Bank x7884 in the amount of \$3,780. Also on February 4, 2020, VICTIM 19⁷ sent a wire transfer to Citizens Bank x7884 in the amount of \$5,150. Following these deposits, INALEGWU withdrew the funds in cash. Citizens Bank x7884 was closed on March 23, 2020.

22. Most recently, on February 5, 2020, INALEGWU opened a business checking account for Inalsbech at Republic First Bank (Republic Bank account x1230, referenced above). INALEGWU was the only authorized signor on the account. On account opening documents, INALEGWU provided the business address as the Maple Shade address. This bank account was used to receive victim money. For example, on April 11, 2020, INALEGLWU endorsed and deposited an \$11,000 cashier's check from VICTIM 26⁸ into the account. Then on April 25, 2020, INALEGWU endorsed and deposited another cashier's check from VICTIM 26, valued at \$80,000 into the account. Republic account x1230 was open as of May 11, 2020.

CO-CONSPIRATOR 1

23. CO-CONSPIRATOR 1 (hereinafter "CC1") is a citizen of Nigeria, believed to be residing in both Nigeria and Turkey.⁹ From approximately April 30, 2016 to April 12, 2020, INALEGWU sent, or attempted to send, approximately \$116,671 directly to CC1 via the use of various money transfer services and bank account transfers. Many of the transfers were sent to personal bank accounts held by CC1 in Nigeria and Turkey.

24. During 2016, CC1 received wire transfers from INALEGWU and a victim, into bank accounts he held in Turkey. Specifically, on July 18, 2016, INALEGWU wire transferred \$17,550 to CC1's personal bank account at Kuwait Turkish Participation Bank ending in 6129. In addition, on December 15, 2016, and December 23, 2016, VICTIM 1 wire transferred \$17,000 and \$3,100, respectively, to a bank account held by CC1 at Turkiye Finans Katilim Bankasi ending in 0994.

25. More recently, during 2019 and 2020, INALEGWU sent money transfers to CC1 in Nigeria utilizing money transfer services such as Boss Revolution, Sendwave, and TransferWise. INALEGWU used these services to transfer money to a bank account held by CC1 at the First Bank of Nigeria PLC ending in 8424. Per financial records, CC1 resides at an address in Nigeria, which is the same address used by the business MOROCHI NIGERIA LIMITED. CC1 is believed to be the owner and operator of MOROCHI NIGERIA LIMITED, as discussed below.

MOROCHI NIGERIA LIMITED

26. The entity MOROCHI NIGERIA LIMITED holds three bank accounts in Nigeria, including an account at Access Bank PLC ending in 6329 (hereinafter

⁶ VICTIM 33 was the victim of a romance scam.

⁷ VICTIM 19 was the victim of a romance scam.

⁸ VICTIM 26 was the victim of, what he believed to be, an investment scam.

⁹ In 2016, CC-1 received Western Union transfers from INALEGWU in Istanbul Turkey, using a Nigerian passport and Turkish driver's license as identification. CC-1 has bank accounts in both Nigeria and Turkey.

“MOROCHI BANK ACCOUNT 1”), an account at Access Bank PLC ending in 4308 (hereafter “MOROCHI BANK ACCOUNT 2”), and an account at Skye Bank PLC ending in 0582 (hereinafter “MOROCHI BANK ACCOUNT 3”). From November 2017 to January 13, 2020, INALEGWU and/or MATHIEU wire transferred approximately \$2.4 million dollars to these three Nigerian bank accounts. Per financial records, the wires to MOROCHI NIGERIA LIMITED usually occurred within days of the receipt of victim money and were funded with victim money. For example, on March 6, 2018, a \$40,000 check from VICTIM 2 was deposited to TD account x8157, a joint checking account held by MATHIEU and INALEGWU. The check from VICTIM 2 was made payable to MATHIEU, but endorsed and deposited by INALEGWU. Then, on March 13, 2018, \$35,500 was wire transferred from TD account x8157 to MOROCHI BANK ACCOUNT 1. The listed purpose of the wire was “pay invoice.”

27. From 2017 to 2020, INALGEWU and MATHIEU sent a number of wire transfers from their personal and business accounts to MOROCHI NIGERIA LIMITED, and provided the following different purposes for the wires: “pay invoice,” “real estate settlement,” “purchase of property,” “to buys house,” “purchase inventory,” “real estate purchase of property,” “funds to family member,” “family support,” “personal expenses,” “POP goods,” “medical purpose,” “Martins family expenses,” “Martins loan repayment,” “Martins health/medical,” among others.

28. There is probable cause to believe that both INALEGWU and CC1 have a financial interest in the MOROCHI NIGERIA LIMITED bank accounts. First, a number of the purposes of these wire transfers referenced CC1’s family name which suggest CC1’s personal interests in the bank accounts. A review of bank records revealed that CC1 and MOROCHI NIGERIA LIMITED share the same address in Nigeria. Further indicating the relation between these actors and the bank accounts, on one occasion INALEGWU attempted to wire transfer victim proceeds to a personal account held by CC1 in Nigeria, but the wire transfer was returned. Within days of the money being returned, INALEGWU wire transferred a similar amount to a bank account held by MOROCHI NIGERIA LIMITED. Specifically, on March 21, 2018, a \$59,000 check, payable to MATHIEU, from VICTIM 2 was deposited into TD account x8157, a joint bank account controlled by MATHIEU and INALEGWU. The check was endorsed by MATHIEU. Several days later, on March 26, 2018, INALEGWU attempted to transfer \$56,550 from TD account x8157 to a bank account held by CC1 at First Bank of Nigeria Limited ending in 4236. The purpose of the attempted wire transfer was “funds to family member.” The address for CC1 on the attempted wire transfer was the same address used by INALEGWU when sending wire transfers to MOROCHI NIGERIA LIMITED. On April 16, 2018, the wire transfer was returned. After the wire was returned, on April 19, 2018, INALEGWU sent a \$50,000 wire transfer from TD account x8157 to MOROCHI NIGERIA LIMITED. The purpose of this wire was “Real Estate Settlement.” There is probable cause to believe that CC1 controls the MOROCHI NIGERIA LIMITED bank accounts.

THE VICTIMS

29. Victim interviews reveal that the co-conspirators initially established contact with victims through various online dating websites, including but not limited

to Plenty of Fish (“pof.com”), eHarmony.com, and Match.com. The co-conspirators often fraudulently represented themselves to be United States citizens who were overseas for various reasons. After establishing a romantic relationship with the victim, the co-conspirators concocted various stories about their need for money, including for medical expenses, foreign customs fees and taxes, and travel expenses. Victims reported communicating with the co-conspirators via both email and phone.

30. I have included detailed summaries of three of the 33 identified victims. Additionally, a brief explanation of all victims is included. As explained below, federal law enforcement agents and I have linked each of the victims with MATHIEU and INALEGWU and their co-conspirators by numerous means, including but not limited to an examination of bank and other financial records and victim interviews.

VICTIM 1 and VICTIM 2

31. On September 2016, VICTIM 1 began corresponding with an individual purporting to be George “Marek” (hereinafter “Marek”) on MATCH.com, an internet dating website. “Marek” told VICTIM 1 he was from Kentucky, but had recently relocated to Austin, Texas, following the death of his wife. “Marek” told VICTIM 1 he bought and sold jewels for a living and that recent client business had taken him to South Africa. After approximately six weeks of daily contact, and the building of a purported romantic relationship, “Marek” asked VICTIM 1 for approximately \$2,000 to be used for his expenses in South Africa. “Marek” later requested money for a variety of reasons, including to fund his troubled jewel business and for medical expenses. “Marek” communicated with, and provided instructions to, VICTIM 1 by email, phone, and text messaging, using email account georgemarek60@aol.com (hereinafter “SCAM EMAIL 1”) and phone number (502) 382-4376 (hereinafter “SCAM PHONE 1”).

32. Per the review of bank and financial records, from approximately October 2016 to May 2017, VICTIM 1 sent approximately \$114,900 to various individuals and entities at “Marek’s” request via both wire and MoneyGram transfer. At “Marek’s” request, VICTIM 1 wire transferred money to both INALEGWU and MATHIEU. On October 12, 2016, VICTIM 1 wire transferred \$8,000 to a Bank of America ending in 5657 (hereinafter “BoA account x5657”), a personal checking account held by INALEGWU. The following day, \$7,200 in cash was withdrawn from the account. INALEGWU was the sole signor on the account. On April 13, 2017, April 14, 2017, and May 2, 2017, VICTIM 1 sent three wire transfers, totaling \$26,000, to BoA account x7510, MATHIEU’s personal checking account. On April 18, 2017, MATHIEU sent a wire transfer of \$16,650 to a bank account in Turkey held by a co-conspirator. The listed purpose of the wire transfer was “Family Support”.

33. At “Marek’s” request, VICTIM 1 also wire transferred money directly to CC1. On December 15, 2016, VICTIM 1 wire transferred \$17,000 to a bank account in Turkey held by CC1. On December 23, 2017, VICTIM 1 wire transferred an additional \$3,100 to the account. The purpose of both wires was listed as “Insurance payment for George.”

34. In or about March 2017, after exhausting her savings, liquidating her retirement account, borrowing from friends and family, taking out a personal loan, and

maxing out her credit cards, VICTIM 1, employed as the finance director, began embezzling money from her employer, VICTIM 2.¹⁰ VICTIM 1 directed the issuance of checks from VICTIM 2 to the targets, and all of the money embezzled by VICTIM 1 from VICTIM 2 was sent to the targets. VICTIM 1 electronically requested the generation of checks to pay fictitious vendors (the targets), causing VICTIM 2's bank to generate and mail out checks to targets. From May 2017 to September 2018, the targets received by mail approximately \$4 million dollars in checks from VICTIM 2, at VICTIM 1's direction.

35. Of that, approximately \$2 million dollars in checks from VICTIM 2 were made payable to MATHIEU and mailed to her at prior addresses in New Jersey. Per bank records, the checks were deposited into bank accounts held by MATHIEU, including BoA account x7510, Wells Fargo account ending in 6673 (hereinafter "WF account x6673"), and HSBC account ending in 0381 (hereinafter "HSBC account x0381"). Checks from VICTIM 2 were also deposited into TD account x8157, a joint personal checking account held by MATHIEU and INALEGWU. The deposit of checks from VICTIM 2 are further described in the table below:

DATE OF DEPOSIT	AMOUNT OF CHECK	PAYEE NAME ON CHECK	BANK ACCOUNT OF DEPOSIT	ACCOUNT HOLDER(S)
5/22/17	\$30,000	MATHIEU	BoA x7510	MATHIEU
6/12/17	\$70,000	MATHIEU	BoA x7510	MATHIEU
6/30/17	\$60,000	MATHIEU	BoA x7510	MATHIEU
7/31/17	\$30,000	MATHIEU	BoA x7510	MATHIEU
7/31/17	\$100,000	MATHIEU	BoA x7510	MATHIEU
9/6/17	\$70,000	MATHIEU	BoA x7510	MATHIEU
10/2/17	\$75,000	MATHIEU	BoA x7510	MATHIEU
10/2/17	\$85,000	MATHIEU	BoA x7510	MATHIEU
10/10/17	\$90,000	MATHIEU	BoA x7510	MATHIEU

¹⁰ VICTIM 1 was charged, and subsequently pled guilty in local court, for her crimes against VICTIM 2.

10/23/17	\$20,000	MATHIEU	BoA x7510	MATHIEU
11/29/17	\$80,000	MATHIEU	TD x8157	MATHIEU and INALEGWU
12/20/17	\$70,000	MATHIEU	TD x8157	MATHIEU and INALEGWU
1/29/18	\$72,000	MATHIEU	TD x8157	MATHIEU and INALEGWU
2/12/18	\$30,000	MATHIEU	TD x8157	MATHIEU and INALEGWU
3/6/18	\$40,000	MATHIEU	TD x8157	MATHIEU and INALEGWU
3/19/18	\$61,000	MATHIEU	TD x8157	MATHIEU and INALEGWU
3/21/18	\$59,000	MATHIEU	TD x8157	MATHIEU and INALEGWU
4/10/18	\$90,300	MATHIEU	TD x8157	MATHIEU and INALEGWU
4/20/18	\$82,200	MATHIEU	TD x8157	MATHIEU and INALEGWU
5/11/18	\$84,250	MATHIEU	WF x6673	MATHIEU
5/14/18	\$88,250	MATHIEU	HSBC x0381	MATHIEU
6/5/18	\$87,200	MATHIEU	TD x8157	MATHIEU and INALEGWU
7/2/18	\$88,150	MATHIEU	TD x8157	MATHIEU and INALEGWU
7/26/18	\$88,000	MATHIEU	TD x8157	MATHIEU and INALEGWU
7/30/18	\$87,000	MATHIEU	TD x8157	MATHIEU and INALEGWU
8/8/18	\$85,500	MATHIEU	TD x8157	MATHIEU and

				INALEGWU
8/8/18	\$89,500	MATHIEU	TD x8157	MATHIEU and INALEGWU
9/13/18	\$86,500	MATHIEU	TD x8157	MATHIEU and INALEGWU
9/14/18	\$88,500	MATHIEU	TD x8157	MATHIEU and INALEGWU

36. Once the checks were deposited into bank accounts held by MATHIEU, both MATHIEU and INALEGWU laundered the proceeds to disguise the source of the money, pay themselves, and distribute victim proceeds to co-conspirators in Nigeria and Turkey, including but not limited to CC1 and MOROCHI NIGERIA LIMITED.

37. On December 24, 2018, a local detective in Kentucky interviewed MATHIEU by phone regarding possible fraudulent activity relating to her bank accounts. The detective asked MATHIEU if she knew VICTIM 1. MATHIEU responded that she did not know, and had never spoken to, VICTIM 1, but that she had heard her husband (INALEGWU) talk about VICTIM 1. The detective asked MATHIEU if she had heard of VICTIM 2¹¹, to which MATHIEU responded she had not. MATHIEU stated that INALEGWU operated a business in Africa and needed to transfer money to Africa, but had a bank account closed and was unable to open a bank account in the United States because he did not have a social security number. INALEGWU asked her to open a bank account for him. MATHIEU stated that INALEGWU told her he had vacation homes and rental apartments in Africa and that the money from VICTIM 2 was for his African business. When asked the name of INALEGWU's business in Africa, MATHIEU responded she did not know. MATHIEU stated she endorsed and deposited the checks from VICTIM 2, that INALEGWU also deposited some of the checks, and that sometimes INALEGWU electronically deposited the checks using a phone application. MATHIEU also stated that INALEGWU initiated wire transfers from the account online. MATHIEU stated she was unemployed and that INALEGWU did his best to take care of the family and that INALEGWU financially supported the family.

38. In total, law enforcement has identified approximately 27 victims of romance scams, wherein victims sent money to either INALEGWU, MATHIEU or directly to a foreign bank account associated with the targets. The trajectory of each of these individual scams follows the same pattern as that of VICTIM 1. While the victims gave the targets varying amounts of money, in total, MATHIEU and INALEGWU have

¹¹ VICTIM 2 is the entity who employed VICTIM 1. VICTIM 1 embezzled money from VICTIM 2 and sent it to MATHIEU and others. At the time of the interview, MATHIEU had received approximately \$2 million dollars in checks from VICTIM 2.

obtained personally obtained approximately \$3.1 million in victim monies.

VICTIM 7¹²

39. On July 12, 2019, VICTIM 7 reported to local law enforcement in Massachusetts that he was defrauded out of \$10,098 when attempting to rent an apartment. VICTIM 7 explained that he located an apartment he wished to rent in an online advertisement. After contacting an individual regarding the apartment, he was directed to wire transfer money, as a down payment and security deposit, to an M&T Bank account ending in 2493 (hereinafter “M&T account x2493”), an account controlled by INALEGWU.

40. After wire transferring the money to INALEGWU, VICTIM 7 discovered that the apartment was not actually available for rent and that he had been defrauded. The overall investigation revealed that VICTIM 7 transferred \$10,098 to M&T account x2493 on June 14, 2019. That very same day, \$2,000 in cash was withdrawn from the account. A few days later, on June 17, 2019, a check was written from M&T account x2493 in the amount of \$9,300 and made payable to INALEGWU’s company, INALSBECH, LLC.

41. On November 2, 2019, after speaking to VICTIM 7, a local detective in Massachusetts contacted INALEGWU by phone at INALEGWU PHONE 1 and explained to INALEGWU that \$10,098 was transferred to his M&T bank account from VICTIM 7 as part of an apartment rental scam. The detective told INALEGWU that he would send INALEGWU an email with several questions about the suspicious transactions on his M&T account. INALAGWU agreed to respond to the email.

42. On the same date, the detective sent an email to INALEGWU EMAIL 1 asking INALEGWU to explain several transactions on his M&T bank statement and attached a copy of the statement for reference. The detective asked INALEGWU to explain the incoming wire transfer of \$10,098 from VICTIM 7 on June 14, 2019; the withdrawal of \$2,000 on June 14, 2019; and the check he issued for \$9,300 on June 17, 2019.

43. On November 4, 2019, INALEGWU responded from his personal email and stated that he spoke to his “friend” who agreed to return the money. INALEGWU also provided screenshots of his purported text conversation with his “friend” at telephone number +447418349953. In the text messages, the “friend” tells INALEGWU that another person asked him if he knew someone in the United States who could help him receive some money and that he contacted INALEGWU to play that role. The “friend” further stated that he did not know the money was stolen, and that he would do anything possible to ensure the money was returned.

44. On November 8, 2019, the detective sent an email to INALEGWU’s personal email and stated that INALEGWU needed to answer the questions he previously sent him by email.

¹² To date, law enforcement has identified approximately 3 victims of apartment rental scams.

45. On December 5, 2019, INALEGWU sent an email to the detective from his personal email stating that the \$2,000 withdrawal from the M&T account was for his business in Nigeria and that the source of money for the \$9,300 check was money his friend's wife sent to him to give to her husband.¹³

46. After being notified by law enforcement on November 2, 2019, that he received fraudulently obtained proceeds in his personal checking account, INALEGWU continued receiving and laundering money from victims. From November 27, 2019 to May 11, 2020, INALEGWU received approximately \$408,460 from at least 15 new victims. For example, on December 20, 2019, December 27, 2019, and January 6, 2020, INALEGWU received cashier's checks valued at \$27,000, \$10,000, and \$10,000, respectively, from VICTIM 24. All three checks were payable to Inalsbech, endorsed by INALEGWU, and deposited to Chase account x2551, held in the name Inalsbech and solely controlled by INALEGWU. Shortly following the deposit of cashier's checks from VICTIM 24 (and several other victims), INALEGWU sent a portion of the proceeds to MOROCHI NIGERIA LIMITED in Nigeria via wire transfer.

47. Below is a summary of the transactions completed by, and the losses suffered by, the additional identified victims who sent money directly to either MATHIEU, INALEGWU, or Inalsbech (the company registered to INALEGWU). This chart does not cover the money that was sent from victims directly to other co-conspirators.

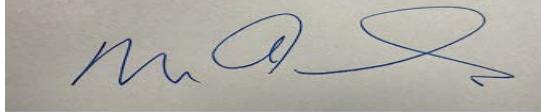
VICTIM	DATE RANGE OF DEPOSITS	METHODS OF PAYMENT	TOTAL AMOUNT LOST	PAYEE NAMES ON CHECK/WIRE
3	April 2018	Cash deposit	\$100,000	MATHIEU
4	February 2019 – April 2019	Check and wire	\$15,748	INALEGWU
5	October 2018	Wire	\$4,500	MATHIEU
6	September 2018	Wire	\$4,050	MATHIEU
8	November 2018	Wire	\$4,100	MATHIEU
9	October 2017	Cashier's Check	\$51,200	INALEGWU
10	November 2017	Wire	\$53,340.60	MATHIEU

¹³ A later inspection by your Affiant revealed that, in fact, this check was made payable to INALSBECH, INALEGWU's company.

11	March 2019	Wire	\$1,500	INALEGWU
12	October 2018	Wire	\$50,000	MATHIEU
13	October 2018- November 2018	Wire	\$22,000	MATHIEU and INALEGWU
14	March 2019	Check	\$199,601	Inalsbech
15	August 2019	Check	\$21,000	Inalsbech
16	June 2019	Wire	\$55,850	INALEGWU
17	February 2017	Moneygram /Western Union	\$9,750	MATHIEU
18	January 2020	Wire	\$42,000	Inalsbech
19	February 2020	Wire	\$5,150	Inalsbech
20	December 2019	Wire	\$23,700	Inalsbech
21	October 2019	Wire	\$1,500	INALEGWU
22	December 2019	Wire	\$13,800	INALEGWU
23	December 2019	Wire	\$41,000	Inalsbech
24	December 2019 – January 2020	Cashier's checks	\$47,000	Inalsbech
25	January 2020 – February 2020	Wire	\$13,600	INALEGWU and Inalsbech
26	March 2020 – May 2020	Wire and Cashier's checks	\$144,500	INALEGWU and Inalsbech
27	February 2020 – March 2020	Wire	\$5,800	Inalsbech
28	May 2020	Wire	\$5,480	INALEGWU
29	May 2020	Wire	\$15,000	INALEGWU

				and Inalsbech
30	December 2019 – March 2020	Wire	\$24,000	Inalsbech
31	January 2020	Check	\$3,500	Inalsbech
32	February 2020 – March 2020	Wire	\$20,150	INALEGWU and Inalsbech
33	February 2020	Wire	\$3,780	Inalsbech

Pursuant to Fed. R. Crim. P. 4.1, Special Agent Gibson was sworn and attested to the contents of this affidavit.



Date: June 18, 2020

SPECIAL AGENT MELISSA GIBSON

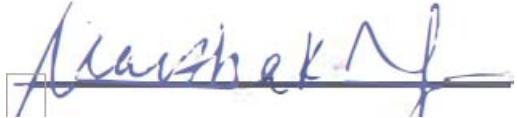


Date: June 18, 2020

HON. ANN MARIE DONIO
United States Magistrate Judge

CONTENTS APPROVED

UNITED STATES ATTORNEY

By: 

Martha K. Nye, AUSA

Date: June 17, 2020